

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION

RECEIVED

2007 JUN 25 A 9:29

George D. McCarley  
Plaintiff

v.

Household Finance Corporation III  
Defendant

Civil Action No. 3:06-CV-0091-MEF  
Lead Case<sup>1</sup>

Motion for Permission to Request Extension of Time of Disclosure Period

Plaintiff respectfully requests this court extend the time period allocated for Disclosure until the end of August 31, 2007. The court had originally scheduled disclosure period to end as of the end of June 2007. This extension should not present any calendar docket difficulty as trial date is not scheduled until April of 2008,

Purpose of Extension of time

Defendant has proven to be very slow to respond to any request of any type. It was not until June 11, 2007 that Plaintiff and Defense Counsel met to review the documents of the other side and to exchange and copy same. Both sides had exchanged one round of discovery prior to the review and exchange of basic documents. This would appear to be in reverse to a logical order of exchange.

Now that plaintiff has had the opportunity to fully review and scrutinize the documents provided by defense, it is clear that many points of information have been provided by defense that are fully unexpected by plaintiff. These unexpected items have the effect of adding strong weight to the evidence and information already in possession of plaintiff. These documents also raise, once again, the spectre of "criminal actions" being exercised by defense in the act of

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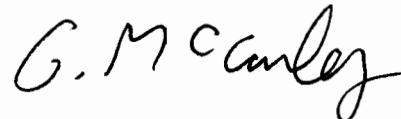
<sup>1</sup> The consolidated case found at 3:06 cv 00091 (lead case) includes Household Finance Corporation, III (00093), HSBC-Gr. Corp. (00102), HSBC Mortgage Services, Inc. (00104), HSBC Finance Corporation (00101), and, Household International, Inc. (00103).

foreclosure that brought this case, while at the same time, providing plaintiff's civil case far greater weight.

Plaintiff will present as example, four (4) documents as proof of his point that an extension of time is required in order to fully scrutinize, compare, and execute additional discovery as related to the documents. In the examples presented, the court will find that Plaintiff has now been provided four (4) different version of an ACCOUNT BILLING SUMMARY STATEMENT. That the different versions provide different information must obviously be "vetted" by discovery process. That certain points contained seem to contradict the points contained in other versions must also be fully explored.

Plaintiff would prefer to move forward with greater speed. However, it is now clear the defendant is not able or willing to provide responses with any greater speed and therefore, the two month extension feels appropriate.

Respectfully submitted



George D. McCarley, Pro Se  
216B Chestnut Street  
Roanoke, Al 36274

#### PROOF OF SERVICE

I, George D. McCarley, do swear or affirm that on this date, June 21, 2007, I have served the enclosed ACTION on each party or that party's counsel, by depositing envelope containing the above documents in the United States Mail properly addressed and with first class postage prepaid.

The Clerk

Middle District of Alabama, Eastern Division  
One Church Street, PO Box 711  
Montgomery, Al 36101-0711  
334-954-3600

Defendant Attorney

Mr. George Parker  
Bradley Arant Rose and White  
Alabama Center for Commerce  
401 Adams Avenue, Suite 780  
Montgomery, Al 36104

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 21, 2007



George D. McCarley

CV-0091-MEF  
00148

2935534 McCarley

Due Date	Date Processed	Amount Received	Late fee Assessed	Late fees paid	Interest	Principal	Advances	Principal Balance	Unapplied funds	Fees	Comments
	6/8/2000							\$ 26,400.00			
Jun-00	6/26/2000	\$ 290.51			\$ 263.78	\$ 26.73		\$ 26,373.27			
Jul-00	8/1/2000	\$ 290.51			\$ 263.51	\$ 27.00		\$ 26,346.27			
Aug-00	8/16/2000	\$	14.53					\$ 26,346.27			
Sep-00	8/16/2000	\$ 290.51			\$ 263.24	\$ 27.27		\$ 26,319.00			
Sep-00	9/15/2000	\$	14.53					\$ 26,319.00			
Sep-00	10/12/2000	\$ 305.04		\$ 14.53	\$ 262.97	\$ 27.54		\$ 26,291.46			
Oct-00	10/12/2000	\$ 305.04		\$ 14.53	\$ 262.70	\$ 27.81		\$ 26,263.65			
Nov-00	11/15/2000	\$	14.53					\$ 26,263.65			
Nov-00	12/15/2000	\$	14.53					\$ 26,263.65			
Nov-00	1/15/2001	\$	14.53					\$ 26,263.65			
Nov-00	1/15/2001	\$ 309.49		\$ 18.98	\$ 262.42	\$ 28.09		\$ 26,235.56			
Dec-00	1/15/2001	\$ 290.51			\$ 262.14	\$ 28.37		\$ 26,207.19			
Dec-00	2/8/2001	\$ (290.51)			\$ (262.14)	\$ (28.37)		\$ 26,235.56			
Nov-00	2/8/2001	\$ (309.49)		\$ (18.98)	\$ (262.14)	\$ (28.09)		\$ 26,263.65			
Nov-00	2/14/2001	\$ 290.51			\$ 262.42	\$ 28.09		\$ 26,235.56			
Dec-00	2/14/2001	\$ 329.49		\$ 38.98	\$ 262.14	\$ 28.37		\$ 26,207.19			
Jan-01	2/15/2001	\$	14.53					\$ 26,207.19			
Apr-01	3/15/2001	Deferred payments to 4/01						\$ 26,207.19			
Apr-01	4/4/2001	\$ 309.65		\$ 19.14	\$ 261.85	\$ 28.66		\$ 26,178.53		\$ 27.00	paid to bad check fees
	4/4/2001	\$ 27.00						\$ 26,178.53			paid to deferred interest
	4/4/2001	\$ 273.35						\$ 26,149.59			
May-01	5/11/2001	\$ 290.51			\$ 261.57	\$ 28.94		\$ 26,149.59			
Jun-01	6/15/2001	\$ 305.04	14.53	\$ 14.53	\$ 261.28	\$ 29.23		\$ 26,120.36			
Jul-01	7/9/2001	\$ 290.51			\$ 260.99	\$ 29.52		\$ 26,090.84			
Aug-01	8/15/2001	\$	14.53					\$ 26,090.84			
Aug-01	9/4/2001	\$ 290.51			\$ 260.69	\$ 29.82		\$ 26,061.02			
Sep-01	9/21/2001	\$	14.53					\$ 26,061.02			
Sep-01	10/1/2001	\$ 290.51			\$ 260.39	\$ 30.12		\$ 26,030.90			
Oct-01	10/15/2001	\$ 290.51			\$ 260.09	\$ 30.42		\$ 26,000.49			
	11/8/2001						\$ (536.00)	\$ 26,000.49			force placed insurance
Nov-01	11/15/2001	\$	14.53					\$ 26,000.49			
Nov-01	11/29/2001	\$ 290.51			\$ 259.79	\$ 30.72		\$ 25,969.76			
Dec-01	12/15/2001	\$	14.53					\$ 25,969.76			
Dec-01	12/28/2001	\$ 290.51						\$ 25,969.76	\$ 290.51		
Dec-01	1/15/2002	\$	14.53					\$ 25,969.76			
Dec-01	1/28/2002	\$ 290.51						\$ 25,969.76	\$ 290.51		

500 LETTER LETTER

APPENDIX  
B

## HOUSEHOLD

DATE 8/11/2004  
PAGE 1  
LOAN NUMBER 2935534

MORTGAGOR MAILING ADDRESS  
GEORGE MCCARLEY

211 CHESTNUT ST

ROANOKE AL 36274  
PROPERTY ADDRESS  
211 CHESTNUT ST

ROANOKE AL 36274

PAYMENT INFORMATION		ORIGINAL INFORMATION		YEAR-TO-DATE	
P&I PAYMENT	290.51	ORIG BAL	26,400.00	INT PAID	0.00
ESCROW	0.00	ORIGINAL RATE	11.990	NEG AMORT	0.00
OPTIONAL INS	0.00	LOAN TERM	240	TAX PAID	0.00
BUYDOWN	0.00	FIRST DUE DATE	06/05/00	INT ON ESCROW	0.00
ASSISTANCE AMT	0.00	LOAN TYPE	CONV		
ANCILLARY	25.13	CURRENT RATE	11.990		
TOTAL PAYMENT	315.64				
UNAPL FUNDS	0.00	NEXT DUE DATE	11/05/02	UNCOLLECTED BALANCES	
		PAID TO DATE	10/05/02	LATE CHARGES	14.53
				FEES	4,262.30
				INTEREST	0.00

DETAIL BY TRANSACTION						
EFF DATE	TOTAL AMT	PRIN AMT	ESCROW AMT	FEE AMT	DESCRIPTION	
PD TO DT	UNAPPLIED AMT	INT AMT	OPT AMT	LT CHG	PRIN BAL AFT	
09/04/01 —	290.51	29.82	0.00	0.00	REG PAYMENT	
08/01	0.00	260.69 1	0.00	0.00		26061.02
10/01/01 —	290.51	30.12	0.00	0.00	REG PAYMENT	
09/01	0.00	260.39 2	0.00	0.00		26030.90
10/15/01	290.51	30.42	0.00	0.00	REG PAYMENT	
10/01	0.00	260.09 3	0.00	0.00		26000.48
11/08/01 —	-536.00	0.00	-536.00	0.00		
08/01	0.00	0.00	0.00	0.00		26000.48
11/29/01	290.51	30.72	0.00	0.00	REG PAYMENT	
11/01	0.00	259.79 4	0.00	0.00		25969.76
12/28/01 —	290.51	0.00	0.00	0.00		
12/01	290.51	0.00	0.00	0.00		25969.76
12/28/01	290.51	0.00	0.00	0.00	LC PYMT WAVD	
12/01	290.51	0.00	0.00	0.00		25969.76

LNW 2935534 GEORGE MCCARLEY 311 CHESTNUT ST HOANOKE AL 16274 EMP 0 WDFG  
 1ST MTGE PRIN 2ND MTGE PRIN ESC BAL REST ESC SUSPENSE ADV BAL REPL RES HUD BAL LC BAL INT DUE DUE DATE KOD PRT OF M  
 28,969.75 .00 .00 .00 290.51 536.00 .00 .00 58.12 .00 12-05-01 .00 52 0  
 P & I 1ST P&I 2ND CO TAX CITY TAX HAZ INS M I F LIEN ESC A & H LIFE MISC REP RES TOT PAYMT INT RATE DT BM  
 290.51 .00 .00 .00 .00 .00 .00 .00 .00 0 .00 339.18 .1199000 3 8  
 OVER/SHORT AMT 44.67  
 1ST ORIG MTG 2ND ORIG MTG PAID BAL RES INT IND CAP FLAG MTGR SHW DEF INT BAL PRIOR YR PPD INT PPD INT IND GPM ORG  
 26,400 0 26,283.65 2 416 76 2216 0.00 0.00 0 0  
 ASSUM-DT XFER-DEED FKA-SEC/NUM LIP PAYOFF FC-TRK-SW YE-ACQ-RPT/DATE SALE-ID EXEMPT FLAG-LN PRT-OPT CALC-METH ELOC ENKRPCY CH/DT  
 /08-18-00  
 PRT PERIOD 1998-DEY-HIST POINTS-PAID/RPTG YR SUPPR-MICH-STMT DI-NOT-RPT-YR REAS CAUS RI-MDR-SW 1ST-DUE-DT REQ STAT/COMPL DT  
 12 N .00 Y  
 IOE CREDIT YTD/W-H SH/W-H BALANCE IOE CREDIT YTD/W-H SH/W-H BALANCE CONSTR CD NO PURGE FLAG/YR ENKRYPT STAT LAST DEF DUE  
 .00 .00 .00 .00  
 REC CORP ADV BAL 3RD REC COMP ADV BAL FORECL WKST CODE/REINSTATE DATE INIT ESC STMT CODE / DATE LOSS MIT STATUS/COMPL DATE  
 .00 .00 05-18-00  
 DUE PROC TP SQ AMOUNT PRINCIPAL PRINCIPAL INTEREST ESCROW ESCROW ADVANCE STATUS STATUS UNEARNED OTHER CFI  
 DATE DATE TR NO RECEIVED PAID BALANCE PAID PAID BALANCE BALANCE AMOUNT BALANCE INT-BAL INT-BAL AMOUNTS DCT  
 BAL-PND  
 11-00 01-15 1 52 1 .00 .00 26263.65 .00 .00 .00 .00 .00 .00 .00 14.53- 11  
 11-00 01-29 1 72 1 600.00 28.09 26235.56 262.42 .00 .00 .00 .00 .00 .00 16.98 11  
 MPL-ID SNON  
 01-29-01 L  
 14.23 AA  
 12-00 01-29 1 72 2 .00 28.37 26207.19 262.14 .00 .00 .00 .00 .00 .00 1  
 BATCH 516 EDIT-SEQ 168307  
 .00 .00 .00  
 MPL-ID SNON  
 01-29-01 L  
 14.21 AA  
 12-00 02-08 1 48 1 .00 28.37- 26235.56 262.14- .00 .00 .00 .00 .00 .00 1  
 BATCH 516 EDIT-SEQ 168307  
 .00 .00 .00  
 REV-CD T1  
 14.21-AA  
 11-00 02-08 1 48 2 .00 28.09- 26263.65 262.42- .00 .00 .00 .00 .00 .00 16.98- 11  
 BATCH 89B EDIT-SEQ 031151  
 .00 .00 .00  
 REV-CD T1  
 14.23-AA  
 11-00 02-14 1 73 1 581.02 28.09 26235.56 262.42 .00 .00 .00 .00 .00 .00 1  
 BATCH 89B EDIT-SEQ 031151  
 .00 .00 .00  
 02-14-01 L  
 14.23 AA  
 12-00 02-14 1 73 2 .00 28.37 26207.19 262.14 .00 .00 .00 .00 .00 .00 1  
 BATCH 402 EDIT-SEQ 179414  
 .00 .00 .00  
 08-14-01 L  
 14.21 AA  
 01-01 02-14 1 73 3 38.98 .00 26207.19 .00 .00 .00 .00 .00 .00 38.98 11  
 BATCH 402 EDIT-SEQ 179414  
 .00 .00 .00  
 BATCH 402 EDIT-SEQ 179416



696 GRAND REGENCY BOULEVARD  
BRANDON, FL 33511  
1-800-333-7023

PE731-45C  
REQ BY CFI

## CUSTOMER ACCOUNT ACTIVITY STATEMENT

DATE 11/02/02  
PAGE 02

GEORGE MCCARLEY  
LOAN NUMBER: 2935534

PROCESS DATE	DUE DATE	ACTIVITY FOR PERIOD TRANSACTION CODE	TRANSACTION DESCRIPTION	EFFECTIVE DATE OF TRANSACTION
07-05-02	02-02	173	PAYMENT	06-30-02
506.28		11.65	258.86	25.13
		25,875.74	276.53-	190.64
				NEW PRINCIPAL/ESCROW BALANCES
08-15-02	02-02	152	LATE CHARGE ASSESSMENT	
0.00		0.00	0.00	14.53-1
				LATE CHARGE
05-15-02	02-02	152	LATE CHARGE ASSESSMENT	
0.00		0.00	0.00	14.53-1
				LATE CHARGE
05-14-02	00-00	631	PROPERTY PRESERVATION DISBURSEMENT	
125.00		0.00	0.00	
05-14-02	02-02	168	REPAY OF ESCROW ADVANCE	
0.00		0.00	0.00	145.00-
				145.00
05-14-02	02-02	163	HAZARD INSURANCE REFUND DEPOSIT	
145.00		0.00	0.00	145.00
				301.66-
				NEW PRINCIPAL/ESCROW BALANCES
04-27-02	02-02	161	ESCROW ADVANCE	
89.34		0.00	0.00	89.34
04-26-02	02-02	148	BAD CHECK REVERSAL LONG FORM	
0.00		31.65-	258.86-	44.67-
				201.17-
				NEW PRINCIPAL/ESCROW BALANCES
04-26-02	03-02	148	BAD CHECK REVERSAL LONG FORM	
0.00		31.97-	258.84-	44.67-
				401.99-
				NEW PRINCIPAL/ESCROW BALANCES
04-19-02	03-02	168	REPAY OF ESCROW ADVANCE	
0.00		0.00	0.00	44.67-
				44.67
04-19-02	03-02	172	PAYMENT	
0.00		31.97	258.54	44.67
				357.32-
				NEW PRINCIPAL/ESCROW BALANCES
04-19-02	02-02	168	REPAY OF ESCROW ADVANCE	
0.00		0.00	0.00	44.67-
				44.67
04-19-02	02-02	172	PAYMENT	
871.53		31.65	258.86	44.67
				201.17
				NEW PRINCIPAL/ESCROW BALANCES
04-15-02	02-02	152	LATE CHARGE ASSESSMENT	
0.00		0.00	0.00	14.53-1
				LATE CHARGE
03-15-02	02-02	152	LATE CHARGE ASSESSMENT	
0.00		0.00	0.00	14.53-1
				LATE CHARGE
02-28-02	01-02	168	REPAY OF ESCROW ADVANCE	
0.00		0.00	0.00	44.67-
				44.67
02-28-02	01-02	173	PAYMENT	01-28-02
0.00		31.34	258.17	44.67
				89.34-8
				PAYMENT SHORTAGE ADV
				245.84-
				NEW PRINCIPAL/ESCROW BALANCES